

Comment received 10/31/11 at label consistency mailbox

To Whom it May Concern, I have worked at Oklahoma State University for the past 28 years in the "Non-Cropland" or "Non-Crop" areas. While our industry personnel are trained on the use of these two terms it is probably a good idea to continue the label terminology trend and replace these "general" use sites with more specific use sites. If this were to happen, my hopes are there would not be a significant burden, of any kind, too our pesticide manufacturers as to having to label their new or old products on multiple use sites when in the past they may have been able to label them under the general terms of "non-crop". It has always been difficult to get products labeled in this small use site. An example would be if in the past a manufacturer would pay a single registration cost for a "non-crop" use site but now would have to pay the same cost for 10 or 15 new specific use sites. Also, it shouldn't be more difficult (extra time or additional processes) for a manufacturer to get a product labeled for numerous specific use sites (non-crop) as opposed to a single "non-crop" use site in the past.

As far as "turf" and "non-crop", they are not the same and never have been, the problem here is lack of understanding of the differences. This is a personnel training item, and should have little if any bearing on this item. Train and hold people responsible.

As far as the implications for ecological and possible human health risk assessments, I very much like to idea of being able to perform specific risk assessments based on the different areas that fall underneath the "non-crop" heading. There are extreme differences in the many specific sites that fall underneath the "non-crop" heading, many of which deal with applications to sites that are associated with permanent or intermittent water. These sites are significantly more sensitive than the "non-crop" sites that are terrestrial only. You are welcome to contact me on this item at your discretion, Thanx, Respectfully submitted, Doug.

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